The Facebook, Inc. v. Connectu, LLC et al
Doc. 245 Att. 13

EXHIBIT M2

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

THEFACEBOOK, INC.,	)	
Plaintiff,	)	
vs.	)	NO. 1 05 CV 047381
CONNECTU LLC,	)	CERTIFIED COPY
Defendant.	)	

CONFIDENTIAL

VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION

OF

JOHN TAVES

8:58 a.m. - 4:49 p.m.

January 29, 2007

719 Second Avenue, Suite Number 900

Seattle, Washington

Joan E. Kinn, CCR, RPR

Court Reporter

A P P E A R A N C E S

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Also Present: DAN BASSETT

the client talks to? 10:13:07
MR. MOSKO: Calls for speculation and lacks 10:13:09
foundation. 10:13:11
A. We pass it around quite a bit. 10:13:11
Q. Okay, so there's not -- there's not sort of 10:13:14
like a team lead and then -- 10:13:16
A. No. 10:13:17
Q. Okay. And what is your role then with the 10:13:18
company? 10:13:21
MR. MOSKO: Generally or in this instance? 10:13:21
Q. Do you understand the question? 10:13:23
A. Well, I'm the -- I'm the CEO, the president, 10:13:24
but, you know, Mike and I are fairly equal, and so we 10:13:34
team up to make the major decisions. 10:13:40
Q. Okay, it's a fairly small company, right? 10:13:42
A. Yes. 10:13:45
Q. So as the CEO, what are your day-to-day 10:13:46
responsibilities? 10:13:50
A. Anything I feel like doing. I mean I worry 10:13:50
about the books, I worry about who we employ, I worry 10:13:55
about the customers, I worry about the -- 10:13:58
Q. Okay, do you do any development work 10:14:01
yourself? 10:14:03
A. Yeah, some. 10:14:04
Q. And did you do any development work for 10:14:05

ConnectU? 10:14:07
A. No. 10:14:08
Q. Who did that? 10:14:09
A. The bulk of it was Winston. 10:14:10
Q. Okay. 10:14:12
A. Joel did some. I think there was others that 10:14:13
did a little bit, but I can't remember the extent of all 10:14:16
of them. 10:14:20
Q. Okay. Did Wayne Chang do any? 10:14:20
A. I don't think so. 10:14:23
Q. Okay. 10:14:25
A. Could be wrong. 10:14:26
Q. Did you have any interaction with iMarc, a 10:14:36
company called iMarc, with regard to your work -- 10:14:51
A. Yeah. 10:14:53
Q. -- with ConnectU? 10:14:53
MR. MOSKO: Let her finish the question 10:14:54
before answering. 10:14:56
Q. So you did, okay. Who at iMarc did you work 10:14:57
with or talk to? 10:15:00
A. I can't remember his name. 10:15:02
Q. Mark Pierrat? 10:15:05
A. That sounds familiar. There might have been 10:15:08
another name too. 10:15:11
Q. Dave Tufts? 10:15:13

Q. Okay. 11:10:04
What did you mean when you said, we've got nothing interesting, go bark up another tree? 11:10:06 11:10:09
A. Well, with Winston gone, I didn't think we had any information for you. Winston is the answers as far as I'm concerned. 11:10:12 11:10:16 11:10:19
Q. Why Winston? 11:10:20
A. He did the majority of the work for ConnectU. 11:10:22
Q. But ConnectU hired Pacific Northwest Software to do the work, correct? 11:10:26 11:10:29
A. Mm-hm. 11:10:30
Q. Do you have any sense for how many documents you produced? 11:10:34 11:10:37
A. No. 11:10:39
Q. Okay. When you say we've got nothing interesting, what do you mean by that? 11:10:40 11:10:45
A. Your -- I don't think I can contribute any information as to anything about the Social Butterfly or Facebook importer or whatever it is, because Winston was the major developer for ConnectU, and he's not an employee, so, you know, I don't have the information. 11:10:56 11:11:01 11:11:05 11:11:11 11:11:17
Q. Okay. So the other tree you wanted us to bark up is Winston? 11:11:28 11:11:28
A. I don't care where you bark, I was just getting tired of paying lawyers to answer these 11:11:28 11:11:30

C E R T I F I C A T E

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

I, the undersigned Notary Public in and for the State of Washington, do hereby certify:

That the annexed and foregoing deposition of each witness named herein was taken stenographically before me and reduced to typewriting under my direction;

I further certify that the deposition was submitted to each said witness for examination, reading and signature after the same was transcribed unless indicated in the record that the parties and each witness waive the signing;

I further certify that all objections made at the time of said examination to my qualifications or the manner of taking the deposition, or to the conduct of any party, have been noted by me upon said deposition;

I further certify that I am not a relative or employee or attorney or counsel of any of the parties to said action, or a relative or employee of any such attorney or counsel;

I further testify that I am not in any way financially interested in the said action or the outcome thereof;

I further certify that each witness before examination was by me duly sworn to testify the truth, the whole truth and nothing but the truth;

I further certify that the deposition, as transcribed, is a full, true and correct transcript of the testimony, including questions and answers, and all objections, motions, and exceptions of counsel made and taken at the time of the foregoing examination.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal this 31st day of January, 2007.

JOAN E. KINN
Notary Public in and for
the State of Washington,
residing at Fall City.
KI-NN-*J-E401NR

JOAN E. KINN
COMMISSION EXPIRES
NOTARY
PUBLIC
01-15-08
STATE OF WASHINGTON